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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 3:20-cr-00249-RS
	)	
Plaintiff,	)	<b>UNITED STATES' SECOND AMENDED</b>
	)	<b>EXHIBIT LIST</b>
v.	)	
	)	Jury Trial: 8:30 a.m. thru ~Mar. 10, 2025
ROWLAND MARCUS ANDRADE,	)	Court: Courtroom 3   17th Floor
	)	Judge: Hon. Richard Seeborg
Defendant.	)	
	)	
	)	

The United States of America hereby submits its second amended list of prospective exhibits it may seek to introduce into evidence at trial. Please see Attachment to this filing, which includes beginning Bates stamp, end Bates stamp, and approximate description of each exhibit. The government will also submit an Excel version of the exhibit list via email to the Court and the parties.

Compared to the first exhibit list, the amendments reflect not only the addition of new exhibits, but also the removal of over 200 exhibits that the government currently does not plan to introduce in its case-in-chief. The government removes these exhibits as a courtesy to the defendant—and in response to

1 his unfounded claims that the number of exhibits is unmanageable. *See, e.g., United States v.*  
2 *Casamento*, 887 F.2d 1141, 1149 (2d Cir. 1989) (rejecting defendant’s argument that trial was too  
3 complex despite “thousands of exhibits and the testimony of more than 275 witnesses” spanning 17  
4 months and 21 defendants). Strikethroughs denote those exhibits the government does not currently plan  
5 to introduce.

6 The United States respectfully reserves its rights, in keeping with the Federal Rules of Criminal  
7 Procedure, to expand or modify this list before trial and to offer additional exhibits as may be necessary  
8 during trial.

9  
10 DATED: February 18, 2025

Respectfully submitted,

11 ISMAIL J. RAMSEY  
12 United States Attorney

13 /s/  
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